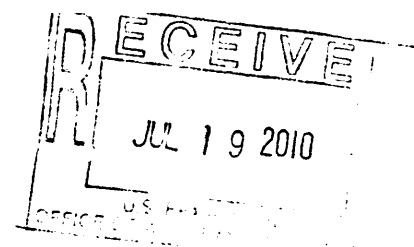




STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000



July 15, 2010

Mr. Eric Paul
Seattle Iron and Metals Corp
601 S. Myrtle St
Seattle, WA 98108

Mike L

Dear Mr. Paul:

RE: Seattle Iron & Metals Corporation (SIM), Stormwater Engineering Report,
Stormwater Quality Report, and Mixing Zone Report

The Department of Ecology received and reviewed the aforementioned reports submitted to Ecology for review and approval by *kpff* Consulting Engineers on behalf of SIM in April 12, 2010. SIM submitted these reports in response to the requirements sought in Order No. 6185 issued to SIM by Ecology on November 14, 2008.

In accordance with RCW 90.48.110 and WAC 173-240-010 through 180 of the Department of Ecology, the above-referred documents have been reviewed and are hereby conditionally **APPROVED**. It is conditionally approved because the scope of this round of technical studies did not cover adequate source control Best Management Practices to satisfy Lower Duwamish Waterway (LDW) cleanup activities. The reports do adequately address several aspects of treatment for the site.

Sampling conducted by EPA regarding the Lower Duwamish Waterway cleanup activities show that SIM's operation is potentially source of additional impacts to the Lower Duwamish Waterway. Sampling showed that dust from SIM's operations may contaminate stormwater. SIM's reports do not account for this source of 'industrial wastewater' as defined in WAC 173-240-020(8). These data indicate that air deposition and truck track out from SIM contribute contamination to other stormwater discharges (i.e., besides SIM Outfall 001), which in turn affect LDW water and sediments. The stormwater flows which are influenced by industrial operations at the facility and which require more evaluation include roof drain runoff, administrative parking lot runoff, and runoff to City of Seattle rights-of-way.

For reissuance of the NPDES permit, the SIM's new permit will require additional studies to characterize and rectify these industrial wastewater discharges, atmospheric deposition, and all other potential source control issues at the site, as well as their impact on LDW water and sediments.

Ecology's responsibility in review of this report is for general public health and environmental quality. It is Ecology's role to provide reasonable assurance that the proposed plan and related activities are adequate and pose no threat to the public health or to the environment. The



Mr. Eric Paul

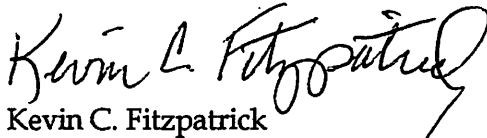
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owners/operators of this project shall retain full responsibility for technical adequacy and completeness of this project. Neither Washington State Department of Ecology, nor the Ecology's reviewer(s), accepts any of the owners/operators professional responsibility and potential liability. This approval does not relieve SIM from responsibility for the lack of technical adequacy or accuracy of the content of the above-referenced documents. Nothing in this approval shall be construed as satisfying other applicable federal, state, or local statutes, ordinances or regulations.

For additional information, please contact Mr. Ed Abbasi P.E., Water Quality Engineer, at the address above or by telephone at (425) 649-7227.

Sincerely,



Kevin C. Fitzpatrick

Water Quality Section Manager

KCF:EA:bl

CC: William M. Armour, P.E.
Allison Geiselbrecht, Floyd/Snider
Lisa Olson
Robert Wright, NWRO, WQ
Central File, NWRO